

FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

**Jun 25, 2024**

SEAN F. MCAVOY, CLERK

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

RICARDO VELAZQUEZ REYES,

Defendant.

No. 4:24-CR-06015-MKD

STIPULATED PROTECTIVE  
ORDER REGARDING  
IDENTIFICATION OF MINOR  
VICTIM PURSUANT TO  
18 U.S.C. § 3509, AND ORDER  
GRANTING MOTION TO  
EXPEDITE

**ECF Nos. 21, 22**

Before the Court are the parties' Stipulation for Protective Order Regarding Identification of Minor Victim Pursuant to 18 U.S.C. § 3509, ECF No. 21, and the United States' related Motion to Expedite, ECF No. 22. Given the nature of the allegations in this case, the parties stipulate to impose privacy protection measures pursuant to 18 U.S.C. § 3509. The Court has reviewed the motions and the record and is fully informed. The Court finds good cause to grant the motions.

Accordingly, **IT IS HEREBY ORDERED:**

1           **1.**     The parties' Stipulation for Protective Order Regarding Identification  
2 of Minor Victim Pursuant to 18 U.S.C. § 3509, **ECF No. 21**, and the United States'  
3 Motion to Expedite, **ECF No. 22**, are **GRANTED**.

4           **2.**     The privacy protection measures mandated by 18 U.S.C. § 3509(d),  
5 which apply when a case involves a person under the age of eighteen years who is  
6 alleged to be a victim of a crime of sexual exploitation, or a witness to a crime  
7 committed against another person, apply to this case.

8           **3.**     All persons acting in this case in a capacity described in 18 U.S.C.  
9 § 3509(d)(1)(B), shall:

- 10           a. keep all documents that disclose the names, identities, personal  
11           identifying information ("PII") or any other information concerning  
12           minors in a secure place to which no person who does not have reason  
13           to know their contents has access;
- 14           b. disclose such documents or the information in them that concerns  
15           minors only to persons who, by reason of their participation in the  
16           proceeding, have reason to know such information;
- 17           c. not permit Defendant to review discovery outside the presence of  
18           defense counsel or a defense investigator;
- 19           d. not permit Defendant to keep discovery in their own possession  
20           outside the presence of defense counsel or a defense investigator; and

1 e. not permit Defendant to keep, copy, or record the identities of any  
2 minor or victim identified in discovery in this case.

3 **4.** All papers to be filed in Court that disclose the names or any other  
4 information identifying or concerning minors shall be filed under seal without  
5 necessity of obtaining a Court order, and that the person who makes the filing shall  
6 submit to the Clerk of the Court:

7 a. the complete paper to be kept under seal; and

8 b. the paper with the portions of it that disclose the names or other  
9 information identifying or concerning children redacted, to be placed  
10 in the public record.

11 **5.** The parties and the witnesses shall not disclose minors' identities  
12 during any proceedings connected with this case. The parties and witnesses will  
13 refer to alleged minor victims only by using agreed-upon pseudonyms (e.g.,  
14 "Minor Victim 1"), rather than their bona fide names, in motions practice, opening  
15 statements, during the presentation of evidence, in closing arguments, and during  
16 sentencing.

17 **6.** The United States may produce discovery to Defendant that discloses  
18 the bona fide identity, images, and PII of the alleged minor victim, in order to  
19 comply with the United States' discovery obligations. Defendant, the defense  
20

1 team, Defendant's attorney and investigator, and all of their externs, employees,  
2 and/or staff members, shall keep this information confidential as set forth above.

3       **7.** This ORDER shall apply to any attorneys who subsequently become  
4 counsel of record, without the need to renew or alter the ORDER.

5       **8.** This ORDER shall apply to the bona fide identity, images, and PII of  
6 any minors who are identified over the course of the case, whether or not such  
7 minors are known to the United States and/or Defendant at the time the ORDER is  
8 entered by the Court.

9       **IT IS SO ORDERED.** The Clerk's Office is directed to enter this Order  
10 and provide copies to all counsel.

11               **DATED** June 25, 2024.

12                               *s/Mary K. Dimke*  
13                               MARY K. DIMKE  
14                               UNITED STATES DISTRICT JUDGE